

MAY 6 1997

100-443887-100

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MM Docket No. 97-91  
RM-8854

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Newspapers, Inc. respectfully requests that the Commission substitute Channel 237A at Jacksboro, and on its own motion, amend the Table of Allotments with respect to Graham, Texas, as follows:

PRESENT

296C3

PROPOSED

296C2

As shown in the Engineering Statement, the special reference point for the allotment is:

N.L.: 35° 15' 11"

W.L.: 98° 30' 33"

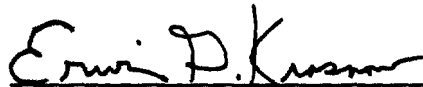
Moreover, there is a wide area in which the proposed Channel 296C2 facility could be located, all of which is on relatively high ground.

WHEREFORE, for the foregoing reasons, Graham Newspapers, Inc. respectfully requests that the Commission substitute Channel 237A for Channel 299A at Jacksboro, Texas, and on its own motion, substitute Channel 296C2 for Channel 296C3 at Graham, Texas.

Respectfully submitted,

GRAHAM NEWSPAPERS, INC.

By:



Erwin G. Krasnow  
Verner, Liipfert, Bernhard,  
McPherson & Hand, Chartered  
901 15th Street, N.W.  
Suite 700  
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Its Attorneys

May 6, 1997

**SELLMEYER ENGINEERING**

BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS  
P.O. Box 356 McKinney, Texas 75070  
MEMBER APCOE  
(972) 542-2056

ENGINEERING STATEMENT IN SUPPORT OF COMMENTS  
OF GRAHAM NEWSPAPERS, INC.  
MM DOCKET 97-91  
RM-8854  
MAY, 1997

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This Firm has been retained by Graham Newspapers, Inc., licensee of Radio Station KWKQ, Graham, Texas to prepare this Engineering Statement in support of its comments in the matter of Mass Media Docket 97-91. Docket 97-91 proposes to amend the FM Table of Allotments in Section 73.202(b) of the Rules with respect to assignments at the communities of Lewisville, Gainesville, Robinson, Corsicana, Jacksboro and Mineral Wells, Texas.

Graham Newspapers, Inc. supports the request of Heftel Broadcasting Corporation in the proposed changes to the Table of Allotments. Graham Newspapers, Inc.'s Station KWKQ would be directly affected by this proposal through the proposed deletion of Channel 299A and substitution of Channel 237A at Jacksboro, Texas.

Graham Newspapers, Inc. recently acquired Radio Station KWKQ and has been exploring possible upgrades to the facility. At present Station KWKQ operates a Class A facility on Channel 296 (107.1). The channel is allotted as a Class C3 channel. Substitution of Channel 237A at Jacksboro would allow Station KWKQ to upgrade its facilities to Class C2 at a reference point located 16 kilometers north northeast of its present site as illustrated by Exhibit E1-1, a spacing study showing the relevant allotments at a Special Reference Point. Exhibit E1-2 is a section of the NOAA tactical navigation chart TPC G-20-D showing the area in which an FM station operating on Channel 296 may be located if Channel 299 is deleted from Jacksboro.

Graham Newspapers, Inc. respectfully requests that the Commission, on its own motion, add the community of Graham, Texas to the pending MM Docket 97-91 and that the Table of Allotments be amended with respect to Graham, Texas as follows:

PRESENTPROPOSED

296C3

296C2

The Special Reference Point for the allotment is:

N.L.: 35° 15' 11"

W.L.: 98° 30' 33"

There is a wide area in which the proposed Channel 296C2 facility could be located, all of which is on relative high ground.

**SELLMEYER ENGINEERING**  
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**EXHIBIT E1-1**  
**FM SPACING STUDY FOR CLASS C-2 OPERATION**  
**SPECIAL REFERENCE POINT**  
**GRAHAM NEWSPAPERS, INC.**  
**RADIO STATION KWKQ**  
**GRAHAM, TEXAS**  
**MAY, 1997**

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FM Study for: KWKQ /SPEC REF PT      FCC Database Date: 4/97      33-15-11
Location: GRAHAM, TX                  Channel Class: C2        98-30-33
Call City, State                      Chan Class Freq kW Latitude Dist. Required
Status Proponent                      File Number HAAT Longitude Azm. Clear (km)
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>>>>>>> Study For Channel 296 107.1 MHz <<<<<<<
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ALLOC GRAHAM, TX      296 C3 107.1      33-07-37 16.0 177
VAC      Docket-89-280      0 98-35-35 209.2 -161.0 SHORT
      Use of 73.215 for short spacing requires: 166 -150.0 SHORT

KWKQ GRAHAM, TX      296 A 107.1 3.00 33-07-37 16.0 166
LIC KSWA, INC.      BLN-6776      30 98-35-35 209.2 -150.0 SHORT
      Use of 73.215 for short spacing requires: 143 -127.0 SHORT

ALLOC JACKSBORO, TX      299 A 107.7      33-14-14 32.4 55
DEL HEFTL BROADCASTING C Docket-97-91      0 98-09-43 93.0 -22.6 SHORT
      Use of 73.215 for short spacing requires: 53 -20.6 SHORT

ALLOC JACKSBORO, TX      299 A 107.7      33-14-14 32.4 55
VAC      Docket-96-10      0 98-09-43 93.0 -22.6 SHORT
      Use of 73.215 for short spacing requires: 53 -20.6 SHORT

ALLOC COLEMAN, TX      296 C3 107.1      31-51-16 177.42 177
USE      -      0 99-25-36 209.3 +0.42 CLOSE

KSTAFM COLEMAN, TX      296 C3 107.1 25. 31-51-16 177.42 177
CP COLEMAN COUNTY BROADCAST      BPH-96041610 65 99-25-36 209.3 +0.42 CLOSE

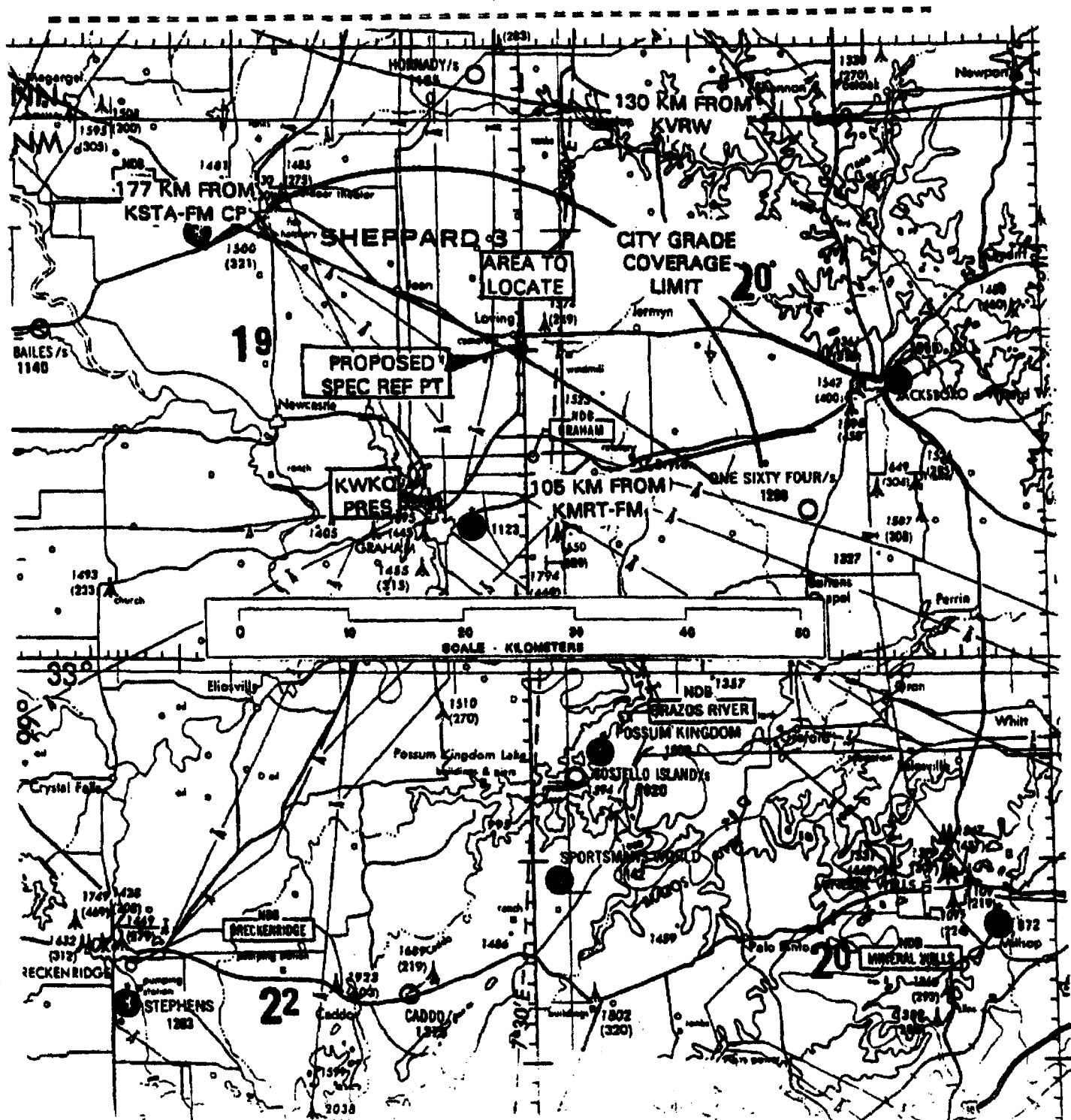
KSTAFM COLEMAN, TX      296 A 107.1 3.00 31-51-16 177.4 166
LIC COLEMAN COUNTY BROADCAST      BLN-6495      55 99-25-36 209.3 +11.4 CLOSE

KNRTFM GRANBURY, TX      294 C 106.7 100. 32-15-07 119.2 105
LIC KCYT-FM LICENSE CORPO      BLN-900125KC 302 98-02-48 158.5 +14.2 CLOSE

ALLOC GRANBURY, TX      294 C 106.7      32-14-35 121.2 105
USE      Docket-79-178      0 98-00-55 157.4 +16.2 CLEAR

KVRW LANTON, OK      297 C2 107.3 50. 34-36-27 151.8 130
LIC ARTHUR PATRICK      BLN-920313KC 150 98-16-26 8.2 +21.8 CLEAR
  
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**EXHIBIT E1-2  
MAP SHOWING AREA TO LOCATE  
CHANNEL 298C-2  
GRAHAM, TEXAS  
MAY, 1997**



**SELLMEYER ENGINEERING**  
BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS  
P.O. Box 356 McKinney, Texas 75070  
MEMBER AFCE  
(972) 542-2056

**CERTIFICATION OF ENGINEER**

I hereby state that:

I am President of Sellmeyer Engineering

The Firm of Sellmeyer Engineering has been retained by Graham Newspapers, Inc. to prepare this Engineering Exhibit


I am a graduate of Arizona State University with the degree of Bachelor of Science in Engineering

I am a Registered Professional Engineer in the States of Ohio and Texas

My qualifications as an Engineer are a matter of record with the Federal Communications Commission, having been previously accepted in applications of this type

This Engineering Exhibit was prepared by me personally or under my direct supervision, and

All facts stated herein are true and correct to the best of my knowledge and belief.

  
J. S. Sellmeyer, P. E.

May 5, 1997

P. O. Box 356  
McKinney, Texas 75070  
972-542-2056



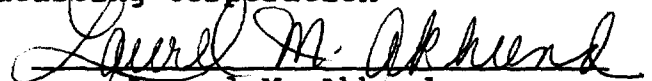
**CERTIFICATE OF SERVICE**

I, Laurel M. Akhund, hereby certify that I have, on this 6th day of May, 1997, send by first-class mail, postage prepared, copies of the foregoing "Comments of Graham Newspapers, Inc." to the following:

\* Robert Hayne, Esq.  
Mass Media Bureau, Room 8337  
Federal Communications Commission  
2025 M Street, N.W.  
Washington, D.C. 20554

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Washington, D.C. 20036-1573

Counsel for Heftel Broadcasting Corporation

  
Laurel M. Akhund

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\* By Hand